

**KENTUCKY DIVISION FOR AIR QUALITY 'S RESPONSES TO COMMENTS  
RECEIVED FROM U.S. EPA ON OWENSBORO MUNICIPAL UTILITIES - ELMER  
SMITH STATION PROPOSED TITLE V PERMIT**

**Significant Comments:**

**Comment 1:**

In the proposed/final determination supplied with the permit, it was revealed that on September 10, 1998 the facility submitted a request to add 10-20% petroleum coke to those fuels being combusted in Unit 1. In addition, the facility made a November 30, 1998, request to burn Tire Derived Fuel (TDF) in Unit 1. Since the facility is an existing major source for PSD, it is necessary for the facility to undertake a "significance" analysis for all pollutants subject to PSD.

**Response:**

Supplemental information related to alternative fuels was submitted by OMU and included in the Title V application. The division has reviewed this information and determined that PSD does not apply as long as OMU operates the FGD while burning petcoke blended fuels. Language provided by U.S. EPA Region 4 has been added to the operating limits and reporting requirements sections of the permit to ensure OMU complies with this condition.

**Comment 2:**

Unit 1, condition 4.a. and Unit 2, condition 4.a. allow the facility to choose between two monitoring scenarios for determining compliance with the facility's allowable sulfur dioxide (SO<sub>2</sub>) emission rate. The first method requires the facility to monitor SO<sub>2</sub> emission using the unit's continuous emissions monitoring systems (CEMS). The second proposed SO<sub>2</sub> monitoring scenario is the use of a daily as-fired sample for determining compliance with the SO<sub>2</sub> allowable emission rate. The facility must decide which monitoring method to utilize for determining compliance with the allowable SO<sub>2</sub> emission rate. The Region concurs with the first approach but will need additional information to determine if daily as-fired sampling would be acceptable for determining compliance in the event that the facility chooses the second approach.

**Response:**

The division concurs with this comment and the second monitoring scenario (daily fuel sampling) has been removed from the permit. The language stating "CEMS shall be installed, calibrated, maintained and operated to measure for sulfur dioxide emissions and either oxygen or carbon dioxide emissions" shall remain.

**Comment 3:**

Emission unit 03, condition 4(c) specifies that a weekly qualitative opacity observation is required to show compliance with the opacity standard for periodic monitoring purposes. The Region believes that since this emission unit is equipped with a continuous opacity monitoring system (COMS) that it should be utilized to determine compliance with the opacity standard.

**Response:**

This is a small oil-fired heating unit that is used very infrequently and does not have a COMS associated with it. DAQ has determined, and included in the permit, that weekly qualitative opacity observations and repairs or correction of any problems represents adequate periodic monitoring for this unit.

**Comment 5:**

*Emission Units 04 and 05, Specific Monitoring Requirements (b)* - These conditions require the source to monitor the processing rate and hours of operation for the ash handling system and ash silos on a weekly basis. The processing rate is used to determine the particulate matter emission limits for these units. However, the mass emissions limitations are specified in pounds per hour based on a three-hour average. In order to provide assurance that the emission units are in compliance with the emission limitations, there must be periodic monitoring that yields reliable data from the relevant time period. Additionally, monitoring only the process rate does not provide sufficient periodic monitoring, because it only allows for the calculation of the limit. In order to assure that these emission units continually comply with the particulate matter emission limits, the permit must include adequate periodic monitoring, such as monitoring certain parameters of the control equipment. Therefore, the permit should also include a parametric monitoring scheme for the control equipment on these units.

**Response:**

Emission units 04 and 05, are subject to Regulations 401 KAR 59:010, New process operations and 401 KAR 61:020, Existing process operations, respectively. The permit requires weekly qualitative observations of the baghouse stack to ensure proper operation of the baghouse on a continuing basis, and that repairs be made as necessary to correct excessive opacity. DAQ has determined that monitoring the processing rate in conjunction with periodic observations of the baghouse exhaust, represents adequate monitoring to ensure continuing compliance with the applicable regulations based on the likelihood of an emission exceedence.

**Comment 6:**

*Emission Units 06 and 07, Testing Requirements (a)* - The source is required to determine the opacity of emissions from the limestone handling and crushing process using Reference Method 22 on an annual basis. However, 40 CFR 60.675(b)(2) specifies that Reference Method 9 shall be used to determine compliance with the opacity standard. 40 CFR 60, Subpart OOO does allow Method 22 to be used to determine compliance with the opacity standard for fugitives, if the transfer point on a conveyer belt or any other affected facility is enclosed in a building. However, the permit does not indicate that the affected facility is enclosed within a building. If the affected facility is in fact enclosed within a building, Method 22 would only be allowed for determining compliance with the fugitive emissions opacity limit. Testing for the stack emissions opacity limit that is contained in the permit must still take place using Reference Method 9. Therefore, the permit should require that testing be accomplished using Method 9 rather than Method 22. Additionally, if the affected facility is enclosed within a building, the permit should state that fact.

**Response:**

The division concurs with your comment. The language stating that the permittee shall determine the opacity of emissions by U.S. EPA Reference Method 22 annually has been changed to U.S. EPA Reference Method 9.

**Comment 7:**

*Emission Unit 06, Specific Monitoring Requirements and Specific Control Equipment Operating Conditions* - The permit contains a particulate matter emissions limit for the limestone handling process. However, the permit does not contain sufficient periodic monitoring to assure compliance with the mass emissions limit. In order to provide assurance of continual compliance with the mass emissions limit, the permit should include parametric monitoring of the control equipment, as well as a specific maintenance plan for the equipment.

**Response:**

The permit requires weekly qualitative observations of the insertable dust collector stack to ensure proper operation of the insertable dust collector on a continuing basis, and that repairs be made as necessary to correct excessive opacity. DAQ has determined that monitoring the processing rate in conjunction with periodic observations of the baghouse exhaust, represents adequate monitoring to ensure continuing compliance with the applicable regulations based on the likelihood of an emission exceedence.

**Comment 8:**

*Emission Units 01 and 02, Emission Limitation (b)* - These conditions limit emissions from units 01 and 02 to no more than 20 percent opacity, except for a period of six consecutive minutes in any sixty minutes during which opacity of 40 percent is allowed. However, this is inconsistent with the Kentucky SIP. Regulation 401 KAR 61:015, Section 4(2)(a) states that for cyclone or pulverized fired indirect heat exchangers, a maximum of 40 percent opacity shall be permissible for not more than two consecutive minutes in any sixty consecutive minutes. Since unit 01 is a coal-fired cyclone unit and unit 02 is a pulverized-coal tangentially-fired unit, Section 4(2)(a) applies. Therefore, these conditions should be changed to only allow 40 percent opacity for only a maximum of two consecutive minutes in any sixty consecutive minutes.

**Response:**

The Regulation that the comment refers to is no longer enforceable by the State. This regulation was replaced by a revision on April 1, 1984 and the current language must remain in the permit as issued. EPA requested that additional language be added stating that the regulation was state-enforceable only. The following italicized language has been added to Section B of the permit where 61:015 is applicable.

“Regulation 401 KAR 61:015, Existing indirect heat exchangers (State Effective Date: April 1, 1984) applicable to an emission unit with a capacity of more than 250 mm BTU per hour and commenced before August 17, 1971. *This regulation is state-enforceable only until such time as the effective date of an EPA rulemaking, approving this regulation into the federally-approved Kentucky State Implementation Plan.*”

**General Comments:**

**Comment 1:**

Please add the following language to the general permit conditions so as to effectively incorporate the Phase II Acid Rain permit and application into the title V permit:

The Acid Rain permit is a portion of the title V permit. The Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) is a binding and enforceable portion of the Acid Rain permit, and the owners and operators of the source must comply with the standard requirements and special provisions set forth in the Acid Rain permit application."

**Response:**

The following language has been added to Section G, Subsection (d)2 Acid Rain Program Requirements as suggested.

The source shall comply with all requirements and conditions of the Title IV, Acid Rain Permit (A-98-003, ATTACHMENT C) and the Phase II permit application (including the Phase II NOx compliance plan and averaging plan, if applicable) issued for this source. The source shall also comply with all requirements of any revised or future acid rain permit(s) issued to this source.

**Comment 2:**

Section G, condition #21 states that "all previously issued construction and operating permits are hereby null and void." This sentence should be changed to more accurately reflect Kentucky ' s combined construction/operating permit program to read as follows:

"All previously issued construction and operating permit are hereby **subsumed** into this permit"

**Response:**

The division concurs with this comment and the above language has been incorporated in Section G, Condition #21.